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March 3, 1980

Michael J. Flynn, Esq. 3 Faneuil Hall Marketplace Boston, Massachusetts 02109

Dear Mike:

You asked me to write a letter reporting a conversation which I had with an individual who made an inquiry about you.

About a month ago an individual called me on the telephone, stated his name was Eric White and that he was a paralegal employed by a New York firm, whose name he mentioned but which I forget. He said he was calling concerning the Sequeira case because his firm in New York had a case very similar to it. He asked a few questions about whether Mr. Sequeira was alive or whether the wife was still around and I said I had no idea. He then started asking some questions about you. He asked if I thought you handled the case well and I said I thought you did. He asked if there was any unethical conduct of yours in the case and as to whether there were any bar association complaints pending. I told him certainly not and at that point I asked him if he was sure that he in fact was a paralegal as he had represented to be and I told him that I thought his questions at that point were quite ridiculous. He repeated that he was and he indicated that he was calling from a pay phone and the conversation ended.

That is all I can remember of it. It certainly did appear to me that when he made some statements implying improper conduct on your behalf he was not who he represented himself to be. Unfortunately I made no notes or other memoranda of the conversation.

Very truly yours,

Douglas E. Moxham